

FILED - LN
 February 4, 2021 10:18 AM
 CLERK OF COURT
 U.S. DISTRICT COURT
 WESTERN DISTRICT OF MICHIGAN
 BY alg / SCANNED BY 6215/21

**IN THE UNITED STATES DISTRICT
 FOR THE WESTERN DISTRICT OF MICHIGAN**

1:21-cv-117

Janet T. Neff - U.S. District Judge
 Phillip J. Green - U.S. Magistrate Judge

Terrence Terrell Moore #208380 ETAL
 James Hale # 182038 ETAL
 DreMaris Jackson #709776 ETAL
 Spencer Holloway #186399 ETAL
 Lewis Hart #230290 ETAL
 Crawford, Kenneth #143333
 Willie Merriweather #131483
 Mark Anderson #329890
 Darryl Dulin #197483
 William Johnson #235820
 Randy Stevens #214912
 Jeffery Gskins 647296
 Felton Mackiehowell #647407

V.

Gretchen Whitmer (Governor)
 Heidie Washington (Director of M.D.O.C.)
 Corizon Health Services, Dr. Margaret Quellete
 Corizon Health Services, RN Blue
 Brian Morrison (Warden) of Lakeland Correctional Facility
 Robert Ault (Deputy Warden)
 J. Traeore (Acting Administrative Assistant)
 Timothy Shaw (RUM)
 Linda Thompson (Law Librarian)
 Correctional Officers
 C/O Donning
 C/O Doffing
 C/O Minor

We as a class move pursuant to Federal Civil Rule 23 (a),(b)(2)
 on behalf of all members under the applicable authority of law.

CLASS STATEMENT

I act as representative for sixty plus members (jonder) of actions to be taken as to questions of law and facts, that's all common to the entire class where numerous impracticability's that exist within the class, yet all parties share typical claims and defenses alike and are all fairly the interest of representing class actions. The possibility exist of varying adjudication's with respect to individual class members or incompatible standards of conduct of opposing party and that the opposing party has acted or refused to act on grounds that apply generally to the class general welfare and liberty to life. Due to Covid 19 Sars Disease (Cov, RTP, RNA, STP) so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class action as a whole. There's common questions of class members predominancy or superior to the other available methods

for fairness and efficiency to adjudication of the controversy and the extent and nature of any litigation concerning the controversy already begun by or against any class members (separately). The numerosity requirement is the very fact of this action specification, the requirement of impracticability of joinder must be affirmatively and specifically addressed (class members would swear by oath in a court of law). All claims of the class, issues and defenses are alike or same. This lawsuit assert violations of the plaintiffs state and federal civil and constitutional rights and seek injunctive relief to end the alleged violations of plaintiff rights, and money damages for class members to compensate them for their injuries. And the request of appointment of class counsel as to protection orders class claims for equity of and for members grievances of class interest. Golden v City of Columbus, 404 F. 3d, 950, 965 (6th Cir. 2005). P. Orders., (5) (c) (1)

CLASS CLAIMS

- * There's a constitutional 8th Amendment violation claim by all class members in this action his or her rights (multiplicity of punishment) (Cruel and unusual punishment)
- * There is a constitutional 1st. Amendment violation claim by all class members in this action (his or her right to redress his her grievances) (Delay) (Mail Tampering)
- * There is a constitutional 14th. Amendment violations claim by all members in this action. (His or her liberty to life).
- * There is a constitutional 9th. Amendment violation claim (as to other common law rights) (The disparagement and Denial)
- * There is a constitutional 7th. Amendment right (trial by jury in and civil action), claim by all class members. (Claim)
- * There's a constitutional 5th. Amendment violation claim by all members in this action (his or her liberty to life.

CLASS MEMBERS ISSUES

The 8th. Amendment violation that all class member claims that the violating in the most cruel and unusual way of the protected right from the multiplicity of punish of a U.S. Citizen/Prisoner/ reform and repentive/..

The issue of a 1st. Amendment violation is his right to redress his or her grievances. Not to be impeded

by the defendants administrative process or other unlawful misconducts of speech and media.

The issue of a 14. Amendment violation of his or her rights "Liberty of Life"

The issue of a 9th. Amendment violation of his or her rights (common law) and the enumeration of rights violation.

The issue of a 7th. Amendment right class members assert his or her rights.

The issue of a 5th. Amendment violation "is his liberty to life".

CLASS MEMBER DEFENSES

Representing class member rely upon the protection of his civil and const. rights and the rule of law. All acts that caused injury irreparable harm. Subjection that warrant medical care or deliberate indifference Estelle Gamble 429 US 97 (1976)., Wright v County of Franklin, 881 F. Supp. 2nd. 887.

Representing class member rely upon a true quarantine directive to protect life as to all protocols to protect life. (A brief summary of the test of a document) DOM 2020-30R 1,2,3,4.

Representing class members rely upon the medical context of health care of the protection of life (oath by medical duty to do harm) and as for medical authority over a administrative process. Estelle Gamble 429 US 97 (1976)., Hodges V Corizon 2016 US D. St Lexis 97349

Representing class members rely upon the people interest to the end of litigation. Criminal/Civil for a reformed and repentive prisoner. No distinction between law and equity.

COMMON QUESTIONS

1). Are our medical experts of (C.D.C.) and other (W.H.O.) guidance and informational documents to save life. (Superior to administrative law) its guide judicial law/ court of law of protections.

2). Are directives comported to law by state government agents to act in part or in whole.? On his and her claims.

3). Are the version of the facts "showings" would be proper on one premise but not another if resources are unavailable to class member to prove his or her claims.

HONORABLE COURT INITIATIVE

Respectfully class members. A party may seek certification by motion or the court may on its own initiative make the certification decision which places the onus on the court to make a determination irrespective of whether the parties have requested class actions status. Trevizo v Adams, 455 F3d 1155 (10th. Cir. 2006) McGowan v Favlkner Concerte Pipe Co. 659 F2d 554 (5th. Cir. 1981).

CLASS MEMBERS:

Injunctive Relief:	That 6 feet to 12 feet be a social distancing command directive or order of prisoner in all areas.
Declaratory Relief:	That life of a reformed repentive prisoner be a primary concern or overall that life liberty be foremost of care. To free from any imminent danger or harm toward a citizen/prisoner.
Compensatory/Punitive Relief	One Million Dollars each for a reformed repentive prisoner for the harm of physician and mental distress in defendants official capacity.
Request for class counsel:	All clas members 15 U.S.C.A. § 7804 are requesting class (a) (3) (b) counsel assistance R. 23 (g) <u>Sheinberg v Sorensen</u> 606 F. 3d 130 (3rd Cir. 2010)

That this Honorable Court Grant class members a certification to proceed as a class against all impractiabilites of multiple deposits of same issues claims and defenses of all violations that class members suffer and suffering to date due to Covid 19 affects of long term and short term damages. (Complaint of Class Attached.)

Date : 2/2/2021

KAREN KOWALSKI
NOTARY PUBLIC, STATE OF MI
COUNTY OF BRANCH
MY COMMISSION EXPIRES Jun 20, 2021
ACTING IN COUNTY OF

Branch

Respectfully



NOTARY: Karen Kowalski

Commission Expires: 6/20/21 Date _____

County Branch State MI

Cc: File
28 U.S.C. § 1746

Mr. Terrence Tennell Moore #2083
LAKELAND CORRECTIONAL FACILITY
141 FIRST STREET
COLDWATER, MICHIGAN #49038

U.S.

LEGAL MAIL



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CLERK OF THE COURT
DISTRICT COURT FOR THE
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OF MICHIGAN
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